

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO.: 22-cv-22538-ALTMAN/REID

PIERCE ROBERTSON, *et al.*, on
behalf of himself and others similarly
situated,

Plaintiffs,

v.

MARK CUBAN, *et al.*,

Defendants.

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION TO
TRANSFER VENUE TO THE NORTHERN DISTRICT OF TEXAS**

Plaintiffs respectfully move the Court for an order granting Plaintiffs a brief extension, up to March 3, 2023, to respond to Defendants' Motion to Transfer Venue to the Northern District of Texas (the "Motion to Transfer") (D.E. 90).

Defendants filed their Motion To Transfer on January 31, 2023, directed to the current Complaint and Plaintiffs. Plaintiffs will be filing an Amended Complaint by February 24th (the Court-ordered deadline). Plaintiffs' response to the Motion to Transfer is currently due on February 14th.

All counsel conferred and agreed that Plaintiffs should be provided with an additional week after the deadline to file the Amended Complaint to serve an Opposition to the Motion to Transfer (if it is still applicable). Defendants request (and Plaintiffs consent) to affording Defendants an additional 14 days to file any Reply.

Plaintiffs respectfully request that this Court grant Plaintiffs extension, up to and including **March 3, 2023**, to respond to Defendants' Motion to Transfer, together with any such other relief this Honorable Court deems just, equitable, and proper.

S.D. FLA. L.R. 7.1 CERTIFICATION

Plaintiffs' Counsel have conferred with Defendants' Counsel in a good faith effort to resolve this motion, and gladly report that Defendants consent to the requested relief.

CASE NO.: 22-cv-22538-ALTMAN/REID

Dated: February 13, 2023

Respectfully submitted,

By: /s/ Adam Moskowitz

Adam M. Moskowitz

Florida Bar No. 984280

adam@moskowitz-law.com

Joseph M. Kaye

Florida Bar No. 117520

joseph@moskowitz-law.com

Barbara C. Lewis

barbara@moskowitz-law.com

Florida Bar No. 118114

THE MOSKOWITZ LAW FIRM, PLLC

2 Alhambra Plaza, Suite 601

Coral Gables, FL 33134

Telephone: (305) 740-1423

By: /s/ David Boies

David Boies

(Admitted *Pro Hac Vice*)

BOIES SCHILLER FLEXNER LLP

333 Main Street

Armonk, NY 10504

Phone: (914) 749-8200

dboies@bsfllp.com

By: /s/ Stephen Neal Zack

Stephen Neal Zack

Florida Bar No. 145215

BOIES SCHILLER FLEXNER LLP

100 SE 2nd St., Suite 2800

Miami, FL 33131

Office: 305-539-8400

szack@bsfllp.com

uungaro@bsfllp.com

Co-Counsel for Plaintiffs and the Class

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the forgoing was filed on February 13, 2023, via the Court's CM/ECF system, which will send notification of such filing to all attorneys of record.

By: /s/ Adam M. Moskowitz

ADAM M. MOSKOWITZ

Florida Bar No. 984280